

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

WORCESTER DIVISION

C.A. No. 4:09-cv-40041

SAMUEL CHENG,

Plaintiff

vs.

**SUNOCO, INC. (R&M) [misnamed
SUNOCO, INC.],**

Defendant

JOINT SCHEDULING CONFERENCE STATEMENT

Pursuant to Fed. R. Civ. P. 16(b), Local Rule 16.1 and this Court's "Notice of Scheduling Conference," the parties file this Joint Scheduling Conference Statement and the following proposed deadlines:

1. The parties shall make their automatic disclosure pursuant to Rule 26 on or before June 6, 2009.
2. The deadline to join other parties and to amend the pleadings: June 30, 2009
3. The deadline for serving requests for production of documents and interrogatories: August 31, 2009
4. The deadline for service of requests for admission: November 30, 2009
5. The deadline for non-expert depositions to be completed: December 15, 2009
6. Deadline for all non-expert discovery to be completed: January 29, 2010
7. Status conference date: To Be Determined
8. Deadline for Plaintiff to designate a trial expert: February 1, 2010
9. Deadline for deposing Plaintiff's trial expert: March 31, 2010

10. Deadline for Defendant to designate a trial expert: March 1, 2010
11. Deadline for deposing Defendant's trial expert: April 30, 2010
12. Deadline for filing dispositive motions: May 31, 2010
13. Oppositions to dispositive motions must be filed within 30 days of service of the motion
14. Pre-trial conference: To Be Determined

The undersigned certify that they have conferred with their respective clients and/or their clients' principles (i) with a view of establishing a budget for the costs of conducting the full course, and various alternatives, of the litigation; and (ii) to consider the resolutions of the litigations through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

SAMUEL CHENG
By His Attorney:

SUNOCO, INC. (R&M)
By Their Attorney:

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Dated: 4/24/2009

CERTIFICATION

I hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Michael E. Levinson
Michael E. Levinson